

MARGARET A. MCLEATCHIE, Nevada Bar No. 10931
MCLEATCHIE LAW
 701 East Bridger Ave., Suite 520
 Las Vegas, Nevada 89101
 Telephone: (702) 728-5300; Fax: (702) 425-8220
 Email: maggie@nvlitigation.com
Attorney for Plaintiff Nebyou Solomon

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NEBYOU SOLOMON, an individual,
 Plaintiff,
 vs.

LAS VEGAS METROPOLITAN POLICE
 DEPARTMENT; JOSEPH LOMBARDO,
 individually and in his official capacity as
 Sheriff; JOHN L. PELLETIER, an
 individual; RICHARD E. MAUPIN, an
 individual; RYAN J. FRYMAN, an
 individual; JUAN D. CONTRERAS, an
 individual; ALLEN J. PAVESE, an
 individual; BRANDON M. MEADS, an
 individual; FASHION SHOW MALL, LLC,
 a Nevada limited-liability company;
 UNIVERSAL PROTECTION SERVICE,
 LLC, a Nevada limited-liability company;
 DOE SECURITY GUARDS I – III,
 individuals,
 Defendants.

Case. No.: 2:19-cv-00652-JAD-DJA

**STIPULATION AND ORDER TO
 EXTEND THE DEADLINE FOR
 PLAINTIFF’S RESPONSE TO
 DEFENDANT FASHION SHOW
 MALL, LLC’S MOTION TO
 DISMISS (ECF No. 13)**

(FIRST REQUEST)

ECF No. 21

Pursuant to LR IA 6-1, Plaintiff NEBYOU SOLOMON and Defendant FASHION
 SHOW MALL, LLC, by and through their respective counsel, hereby stipulate and request
 that this Court extend the deadline to file the Plaintiff’s Response to Defendant Fashion Show
 Mall LLC’s Motion to Dismiss (ECF No. 13) filed on August 29, 2019 by an additional
 fourteen (14) days, extending the deadline from September 12, 2019 to September 26, 2019.
 This is the first stipulation for extension of time for Plaintiff to file his Response.

This Request for an extension of time is not sought for any improper purpose or
 other purpose of delay. This request for extension is based upon the following:

Counsel for Plaintiff initiated this request due to numerous competing deadlines, including a court-ordered settlement conference on September 12, 2019 in *Thomas Walker, et al. v. City of North Las Vegas, et al.*, U.S. Dist. Court Case No. 2:14-cv-01475; and an evidentiary hearing on September 27, 2019 in *Hickman v. State*, Eighth Judicial Dist. Court Case No. C-12-278699-1. Additionally, the undersigned will be out of the jurisdiction on September 19, 2019 through September 20, 2019 for work on a federal case in the Central District of California. Counsel for Plaintiff also has numerous deadlines in other state court matters which interfere with the preparation of the Responses in this matter.

WHEREFORE, the parties respectfully request that this Court extend the deadline to file Plaintiff's Response to Defendant Fashion Show Mall's Motion to Dismiss (ECF No. 13) filed on August 29, 2019 to up to and including September 26, 2019.

IT IS SO STIPULATED.

DATED this 12th day of September, 2019.

DATED this 12th day of September, 2019.

MCLEATCHIE LAW

KAEMPFER CROWELL

/s/ Margaret A. McLetchie


/s/ Bryan M. Viellion

Margaret A. McLetchie, NBN 10931
701 E. Bridger Ave., Suite 520
Las Vegas, NV 89101
Attorney of Plaintiff Neybou Solomon

Anthony J. Celeste, NBN 8776
Bryan M. Viellion, No. 13607
1980 Festival Plaza Dr., Suite 650
Las Vegas, Nevada 89135
*Attorneys for Defendant
Fashion Show Mall LLC*

ORDER

Based on the stipulation between plaintiff and defendant Fashion Show Mall, LLC [ECF No. 21], which I construe as a joint motion under Local Rule 7-1(c) because it was signed by fewer than all the parties or their attorneys, and with good cause appearing, IT IS HEREBY ORDERED that **plaintiff's deadline to respond to Fashion Show Mall LLC's Motion to Dismiss [ECF No. 13] is extended to September 26, 2019.**



U.S. District Judge Jennifer A. Dorsey
Dated: September 17, 2019